

**PUGET
POWER**

June 24, 1982
PLN-260

U.S Nuclear Regulatory Commission
Washington, D.C. 20055
Attention: Director, Division of Licensing

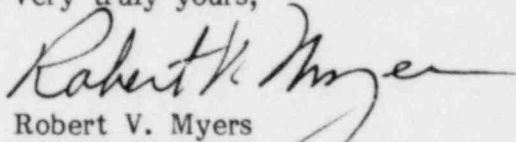
Subject: Draft Environmental Statement (NUREG 0894)
Related to the Construction of
Skagit/Hanford Nuclear Project, Units 1 & 2
Docket Nos. 50-522 and 50-523

Reference: Federal Register, Page 20234,
Vol. 47, No. 91, May 11, 1982

Gentlemen:

In accordance with the above reference, enclosed are Puget Sound Power &
Light Company's comments regarding the subject document.

Very truly yours,


Robert V. Myers
Vice President
Generation Resources

Encl.

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SKAGIT/HANFORD NUCLEAR PROJECT
DRAFT ENVIRONMENTAL STATEMENT
COMMENTS BY PUGET SOUND POWER & LIGHT COMPANY

Comment Number	Page/Para/Line	Comment
1	iii/5/5	Change "...diffuser..." to "...single discharge nozzle..." Ref. DES p. 4-12 and ASC/ER p. 3.4-5.
2	3-1/5/1-6	Change the first sentence to "The applicant has expended approximately \$300 million on the Project, a substantial portion of which has been for equipment." The \$300 million includes all project costs e.g., siting studies and licensing efforts. Also, change "PSP&L" to "applicant." Finally, change the last sentence to "Potential losses from cancellation of the project would ultimately be borne by applicant's stockholders or ratepayers."
3	3-22/5/11-12	Change "The Ryderwood site area is known..." to "The Ryderwood Site general region is known...". NUREG-75/025 p. B-20 refers to the two species as being in the "general region". No records are known of either species in the site vicinity. The historical range of the Columbian White-Tailed Deer probably included the site vicinity but recent records show the nearest known population to be more than 15 miles away along the Columbia River bottom lands. The Brown Pelican is a coastal bird sometimes found about 45 miles away from the Ryderwood site. Ref. Letter from D. Every, NUS Corporation, to R. Spencer, Washington State Department of Game, dated May 14, 1982, attached.

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4	3/25/3/6-9 3-32/2/6	The water quality classification of the Skagit River at the point of the proposed discharge is Class A. Ref. response to Question E200.02. The AA classification of the Skagit River begins upstream of the point of the proposed discharge. Since these paragraphs address the discharge, the A classification is the relevant classification here and both paragraphs should be revised to reflect this.
5	4-14/2/1-2	Change "final designs" to "designs". The description of the radwaste systems is based on preliminary design. Final design will be provided in the Operating License Environmental Report.
6	4-15/1/8 4-37/6/6 4-39/1/3-4 4-64/3/All 4-65/2/17 4-65/3/3 4-231/3/9 4-233/2/1-7	The applicant has committed to terminate the cooling tower blowdown until the total residual chlorine concentration has been at or below 0.14 mg/l for 15 minutes. Ref. ASC/ER p. 3.6-6 Amendment 5.
7	4-29/2/4-5	Change "This amount would have little effect on the hydrologic condition of the Columbia River." to "There will be no discharge of storm runoff from the S/HNP plant site to the Columbia River". The plant site is about 7 miles from the Columbia River and there will be no storm sewers; the intervening topography and soil are such that no surface runoff from the plant site will reach the Columbia River.

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8	4-36/6/1-2 4-48/4/7-8	As indicated in the ASC/ER (p. 2.2-21, Figure 2.2-18 and Table 2.2-22) the nearest known spawning areas are 3.5 miles upstream and 7.5 miles downstream. The applicant is unaware of any additional information concerning spawning areas closer to the intake/discharge structures.
9	4-37/6/6	Assuming 0.14 mg/l TRC at the S/HNP discharge, compliance with the federal criterion of 0.002 mg/liter would occur under worst-case conditions within 20.4 m (67 ft) downstream of the discharge (ASC/ER p. 5.3-2).
10	4-39/2/3	The S/HNP percolation pond will be designed to accommodate the maximum expected flow rate from the package sewage treatment plant for the refueling outage period (17, 325 GPD). During normal operation, the flow will be about 60% of that during the refueling outage. Additionally, the pond will have sufficient depth margin to ensure that no condition of sewage treatment plant output flow can create an emergency overflow from the pond. Should some unanticipated series of events occur, which did produce an overflow from the percolation pond, the clear, odorless and low BOD sewage treatment system effluent would percolate into the ground adjacent to the pond with effects the same as if that water had percolated through the pond bottom. The applicant therefore considers that containment of emergency overflows is unnecessary.

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|----|---------------------------|---|
| 11 | 4-39/2/4-5
4-233/1/2-3 | There is a concern expressed in the DES that erosion will be increased in the drainage ways downgradient of the S/HNP Site as a result of Site grading, removal of vegetation and placement of six inches of gravel over much of the Site. The Staff suggests as much as 50% of the annual precipitation will leave the Site as surface runoff after the plant is constructed, compared to an existing annual regional runoff of less than 8% in the Pasco Basin. Reasons why any increase in runoff induced erosion downgradient of the Site after plant construction should be insignificant are discussed below. |
|----|---------------------------|---|

The terminology "runoff from the Pasco Basin", includes more than erosion producing surface flow. It also includes "baseflow" which is primarily water that moves below the ground surface and downgradient along the drainage ways. Baseflow is responsible for sustaining perennial streams during periods of low flow (no rain fall or snow melt). Therefore, the baseflow portion of runoff does not contribute to erosion in drainage ways. As a result, the portion of "runoff" that contributes to erosion in the Pasco Basin is even less than the 8% noted above.

The S/HNP Site is located on the drainage divide between the Yakima and Columbia Rivers as such, there is no upstream contributing drainage area above the Site. Thus, any surface runoff moving downgradient from the Site must be initiated on or below the Site. As noted in the S/HNP PSAR p. 2.4-1, the Site is fairly level with no perennial streams nearby. There are no well defined

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drainage channels and the area is essentially a desert with only 6.3 inches of average annual precipitation.

It is granted that site preparation, which includes grading, removal of vegetation, compaction and placement of 6 inches of gravel over much of the Site, could increase runoff from the Site, however, in this desert-like environment with high evapo-transpiration rates, the primary runoff producing events are thunderstorms. The worst runoff would occur during a thunderstorm when the ground is frozen, since evapo-transpiration and infiltration of water into the ground would be minimal. However, the Hanford area and S/HNP Site are at relatively low elevations (plant basemat elevation of 527 feet msl) and experience moderate climates. Thus, conditions when the ground is frozen hard would occur primarily only in the months of December, January and February. Thunderstorms in the Hanford area occur primarily during warm months of the year, when the ground is not frozen and evapo-transpiration is high. For example, the local PMP event, for the neighboring WNP sites is a July thunderstorm. Furthermore, at the S/HNP Site the six hour thunderstorm PMP (11.6 inches of rainfall) is almost identical to the 48 hour winter general storm PMP (11.7 inches of rainfall). Therefore, the probability of large thunderstorms occurring in the Hanford area during times of frozen ground (winter) conditions appears to be very low.

It should be noted that the neighboring WNP site has not experienced any significant increase in downgradient

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		<p>erosion of drainage ways. In particular, construction at the WNP-2 plant has been in progress for nearly 8 years. Furthermore, the WNP-2 site is not located at a topographic divide as is the S/HNP Site, thus, there is potential for surface runoff to occur from areas upgradient of the WNP-2 Site but not at the S/HNP Site. In general, the potential for erosion occurring in the drainage ways downgradient of WNP-2 is greater than at S/HNP.</p> <p>Analyses conducted in the PSAR are related to nuclear safety and not environmental concerns. Thus, the local PMP computation is extremely conservative (100% runoff assumed) and should not be utilized to determine surface runoff for environmental concerns. Environmental analyses are intended to be realistic and reasonable, not ultra conservative. Considering the above points, it is the applicant's opinion that the surface runoff from thunderstorms that might contribute to erosion downgradient of S/HNP might approach the range of 10-15% of rainfall, but surely not as high as 50%. Furthermore, it is the applicant's opinion that there will be no significant increase in downgradient channel erosion below the S/HNP Site since the presence of the S/HNP will not significantly alter the natural drainage courses nor add to the existing erosion pattern and, therefore, drainage courses downstream from the plant do not need to be protected from erosion.</p>
12	4-42/3/5,10	Change "larger boulders" to "boulders". As indicated in the response to ASC/ER Question E290.36, in March 1981,

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		scuba divers made visual observations of the river bottom substrate in the vicinity of the proposed S/HNP intake/discharge site. Divers reported a fairly uniform bottom without significant topographic relief, consisting mostly of cobble (64-256 mm) and a few boulders (greater than 256 mm). Ref. ASC/ER Question E290.36, p. E-134.
13	4-52/1/6-8	This statement implies that some local white sturgeon are anadromous. While the data suggest it is possible for some juveniles to move downstream, the dams on the Columbia River have essentially blocked upstream adult migrations. There are no data to suggest that anadromous sturgeon populations are sustaining themselves in the upper-Columbia River. Ref. ASC/ER Question 290.20 p. E-118.
14	4-55/5/10-16 4-56/1/1-9	As indicated in the Corps of Engineers permit application (Appendix J), 65,000 yd ³ of material was estimated to be excavated for the intake and discharge trenches. This assumes a 3:1 trench slope and a 26-foot trench bottom width for the intake. The surface area disturbed, using these assumptions, would be 145,000 ft ² . Soil borings, to be done at the time of construction, will be utilized to determine the actual slope required. It is likely that the required slope will be steeper than 3:1, thus reducing the amount of excavation and surface area disturbed. If the assumed slope is 0.75:1, the surface area disturbed would be 44,000 ft ² . Similarly, the trench for the discharge line, again assuming a 4-foot bottom width, and a conservative 3:1 slope would disturb about 32,000 ft ² of surface area.

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15	4-59/2/2-5	The applicant does not agree with this statement. Case #1 (maximum S/HNP discharge during minimum river flow) occurring in late summer would include the worst-conceivable conditions for aquatic biota. Ref. ASC/ER p. 5.1-13, NPDES hearings Dr. T. L. Page, p. Tr. 242.
16	4-65/3/3	Delete item (1) "Reduction of TRC to levels below 0.38 mg/l". As indicated on ASC/ER p. 3.6-6, the applicant has already committed to this mitigation measure.
17	4-65/3/4-5 4-233/2/3-4	With respect to item (2), ASC/ER Section 10.5.1.3 provides the applicant's position relative to use of ozone for control of biofouling.

A bromine gas system is similar to a chlorine gas system. The gas is distributed into a circulating water system where it is dissolved into the water. The bromine gas system is no more effective as a biocide than gaseous chlorine and suffers the same personnel hazards as liquid or gaseous chlorine systems which are discussed in ASC/ER Section 10.5.1.2. For these reasons, gaseous bromine is not considered a satisfactory alternative to sodium hypochlorite and mechanical cleaning.

Amendment 5 to the ASC/ER provides the applicant's commitment to limit total residual chlorine (TRC) to 0.14 mg/l in lieu of 0.38 mg/l stated in Amendment 4. This should serve to further reduce the effects of the use of sodium hypochlorite.

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18	4-65/3/6-8 4-233/2/5-7	<p>With respect to item (3), the Vernita Bridge USGS Columbia River water analysis data (ASC/ER Tables 3.6-5 and 3.6-6) show that ambient river suspended solids are 3.7 mg/l for average conditions and 24.0 mg/l for maximum conditions. From these data, the applicant concludes that the Columbia River Hanford Reach is generally quite clear and relatively low in turbidity. The cooling towers will have a concentrating effect which is expected, on the average, to increase the circulating water system suspended solids to ten times that of the river water.</p> <p>While the silt load of the river may scour and keep a once-through facility clean, there is no data to suggest this would occur in a cooling tower system which has: (1) lower internal water velocities, (2) locations where silt will be filtered and/or settle out, and (3) portions of the system exposed to sunlight.</p> <p>The applicant has committed in the NPDES hearings to implementing a chlorine minimization study after plant startup. During this study period, data will be collected which will provide slime and algae growth rate as a function of reduced sodium hypochlorite dosage and any degradation of turbine-condenser performance as a result of subsequent heat exchanger surface biofouling. This same study would then provide a data base from which to evaluate the potential for operation without chlorination and the practicality of reliance on other factors to maintain system cleanliness such as scour from suspended solids in the river water.</p>

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19	4-65/3/9-11	The applicant will analyze relocation of the intake/discharge structures to a point about 762 to 1,219m downstream of the proposed location.
20	4-71/1/4-5 4-233/3/7-9	<u>Astragalus sclerocarpus</u> and <u>Cryptantha leucophaea</u> are not listed as threatened or endangered nor are they a candidate for this status. Ref. ASC/ER p. 2.2-15. Because there are no protection requirements for sensitive species, we suggest that the mitigation requirement for these species be deleted or modified to read "Where possible, construction activities should be directed to avoid disturbing significant populations of <u>Astragalus sclerocarpus</u> and <u>Cryptantha leucophaea</u> ". It should be noted that the applicant has committed to providing a biologist to monitor terrestrial impacts as part of the Construction Impact Control Program. Ref. ASC/ER p. 4.5-6. This will ensure that construction activities will not adversely affect significant populations of these species.
21	4-72/1/3-4 4-76/4/19-20 4-88/4/13 4-90/5/2 4-93/1/8-9 4-93/2/5 4-115/1/6 4-118/1/14 4-119/3/5 4-119/3/8-9 4-124/source	The DES makes reference to and utilizes some data from a working draft of a report that, at one point, was being prepared for the Construction Impact Group (CIG) by Williams, Kuebelbeck and Associates. The CIG, through their attorney Frank J. Owens, has informed EFSEC that, due to the uncertainties in the Tri-Cities area, "the report probably would serve little purpose at this time" and that CIG would have to undertake "additional work before any meaningful conclusions can be drawn." A copy of J. Owen's June 3, 1982 letter is attached.

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	4-126/footnote	Under these circumstances, we believe it would be inappropriate to rely in the DES on the methodology or conclusions that were in the draft report. The local government budget data and the per capita expenditures should be referred directly to the source documents (i.e., the appropriate local budgets) and the analyses completed without the CIG report.
	4-127/table	
	4-133/6/4	
	4-136/1/3	
	4-136/3/6	
	5-16/5/Sec. 5.6.2	
	9-11/Bibliography	
22	4-73/1/3	"Income in some secondary sections..." should be written to state that S/HNP will provide income to these sectors that would not be the case without the project. We suggest: "Income in some secondary sectors, (e.g., trades and services) will be greater with S/HNP than without it. This income source will lessen the adverse effects of the expected decline due to a slowdown in the construction sector."
23	4-78/1/3,6 4-80 Table 4-14	The DES uses an estimate of 2.4 percent annual growth rate for the baseline (without S/HNP case). This is after excluding "nuclear power plant related development." Two sources are used as references: Bonneville Power Administration, 1979; and Benton-Franklin Government Conference, 1980.
		It should be noted that the bibliography section (p. 9-1) does not list a reference for a <u>1980</u> Benton-Franklin Government Conference (BFGC) report or publication. It lists only a supplement to "Benton-Franklin Regional Solid Waste Management Plan and Program," <u>1977</u> .

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		<p>There exists, however, two BFGC reports which might be the source of data for the DES. One is the "Employment and Population Projection Element of the TRI-MATS Detailed Work Program," October, 1977. The other is the "1980 Population and Employment Projections" for the "Tri-Cities Metropolitan Area Transportation Study," January, 1981.</p>
		<p>The BFGC 1980 report uses a 2.4 percent annual rate of increase including the construction sector. Since it was based upon historical data, this implies a much less than 2.4 percent rate of increase because the WPPSS and DOE construction effects were so dominant in the historical data.</p>
		<p>The BFGC 1977 report was based upon growth patterns prior to 1975. In addition, the allocation of basic employment was not properly made (for example, the study did not employ location quotients and assigned whole sectors to basic employment without proper examination, e.g., mining). Consequently, the basic-nonbasic relationship is faulty. In other words, these data were not adequately analyzed and are so dated they could not be expected to provide a suitable base for the DES projections.</p>
		<p>The BPA 1979 report growth rate projection (actually 2.3 percent annual rate of increase) is based on historical data prior to 1978 and includes the construction sector. The principal effects on the construction sector were from WPPSS and DOE which together accounted for more than 55 percent of the Study Area basic employment in</p>

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1979. Since so much of the growth in the Study Area was the result of WPPSS and DOE during this period, the growth rate for the rest of the economy was considerably less and the BPA data actually imply a negative rate of change for the remainder of the economy.

Overall, the 2.4 percent average annual rate of increase assumed for the DES is based upon: (1) dated and obsolete analyses and projections; (2) inadequate adjustments to account for construction sector effects; and (3) under-utilization of current information on WPPSS and DOE schedules and plans for the 1980's as far as these are available.

The result is that the DES baseline (without S/HNP) projections overstate by at least 60 percent the growth demand for goods, services and facilities in the Study Area. This means there will be much greater capacity in the Study Area to support the S/HNP population than is shown in the DES. It also means the employment and income effects of the project will be of a more crucial and positive nature than is shown in the DES.

The ASC/ER used a 1 percent average annual rate of increase for the baseline economy and population projections, when the WPPSS and DOE effects were accounted for separately. (Ref. ASC/ER Section 8.3.6, pp. 8.3-9 to 8.3-12). This is actually a very conservative estimate; it allocates the maximum reasonable demand for goods, services and facilities to the baseline condition. It does not attempt to understate the baseline needs to minimize

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		<p>the S/HNP's projected impacts, but rather, provides for a maximum impact by S/HNP.</p> <p>The ASC/ER analyses and projects were made in early 1982 and used the then current forecasts of WPPSS and DOE on future employment. Subsequent events have demonstrated the conservative nature of the ASC/ER forecasts, and they appear much more reasonable for the 1980-1985 period than those used in the DES. It is also likely they will prove to be more accurate for the remainder of the forecast period (the year 2000), and at any rate, they have more standing than the 2.4 percent rate used in the DES.</p> <p>We strongly recommend the DES use the employment and population projections submitted in the ASC/ER.</p>
24	4-83/2/6	<p>Sentence beginning "As indicated previously..." would be more accurate if it stated: "As indicated previously, since the investment and operational expenditures by the applicant would be new funds in the area, they would lessen the decline in construction employment and income due to the completion of the WPPSS projects."</p>
25	4-100/4/2-3	<p>We suggest that the second sentence might read: "Instead, the S/HNP, by providing housing demand, would more fully utilize the existing housing stock."</p>

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26	4-176/1/4-6 4-234/3/1-3	The Project contracting philosophy has been to make the individual contractors solely responsible to take such measures as may be necessary to assure that the safety and health of those performing work and of the public are safeguarded. Thus, it is the responsibility of the contractor to provide hearing protection and testing for workers, in addition to other safety and health precautions. The applicant does not believe that specific safety measure requirements should be written into the construction contracts.
27	4-231/3/13-14	Change "...if the circulating water has dropped to less than 0.38 mg/l..." to "...until the circulating water total residual chlorine concentration has dropped to less than 0.14 mg/l...". Ref. ASC/ER p. 3.6-6, Amendment 5.
28	5-12/4/3-4 5-16/6/general	The studies referenced in the ASC/ER p. 6.1-8 were detailed aquatic investigations of construction activities of the Supply System's WNP-2 intake installation at Rm 351.7, which would be similar in scale to the S/HNP intake and discharge construction activities.

Because these activities were of similar scale to S/HNP and the study concluded that aquatic impacts of the installation were inconsequential to the aquatic community, the value of conducting additional research is questionable. A minimal monitoring program might be able to detect unavoidable short term changes in localized habitats, but the value of this information in either reducing impacts as they may occur or in reducing impacts elsewhere in the river is not clear.

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		Based upon diver observations, we do not anticipate substantial differences in substrate characteristics between Rm. 361.5 and 351.8. In-river soil tests, however, are going to be conducted prior to final design of the intake and discharge structures. Should results of these tests suggest different soil conditions than anticipated, expansion of the aquatic monitoring program during construction will be considered.
29	5-17/2/1-9	The quality assurance program is part of the formal Construction Impact Control Program (CICP) to be prepared by the applicant and submitted to the NRC and EFSEC for approval (Ref. ASC/ER, p. 4.5-1).
30	Sec. 5.7.2.2 5-17 5-18 5-19	The applicant's preoperational monitoring program is conceptual at this time. A detailed preoperational monitoring program will be developed and implemented two years before plant operation. This program will require EFSEC's approval prior to implementation. Although consideration will be given to the concerns raised in DES Section 5.7.2.2, we suggest deleting the recommendations from this construction DES.
31	Appendix F/p. F-3	The applicant's position on the evacuation time estimate for the plume exposure pathway emergency planning zone is set forth in PSAR Appendix 13A. The evacuation speed associated with this estimate is approximately 45 mph. ASC/ER Section 7.4 assumed a conservative radial evacuation speed of 10 mph. The 4.14 mph utilized by the Staff is unduly conservative considering the conservatism already built into the applicant's calculations.

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32	Appendix J	The environmental analysis presented in Appendix J is written assuming BPA would own and construct the additional transmission line extensions. The environmental analysis in the ASC/ER was written based on the applicant owning and constructing the additional transmission lines. Although there are small differences in these discussions (e.g., right-of-way widths), conclusions reached by the applicant are similar to those in Appendix J.



NORTHWEST ENVIRONMENTAL CENTER

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May 14, 1982

NWEC-05-82-39

S/HLS-260

Mr. Rocky Spencer, Wildlife Biologist
Washington State Department of Game
Nongame Wildlife Program
c/o The Evergreen State College
3109 Seminar Building
Olympia, WA 98505

Dear Mr. Spencer:

This is to confirm our telephone conversation of May 13, 1982 concerning the Columbia Whitetail Deer and the Brown Pelican with reference to a location near the intersection of Interstate Highway 5 and the Cowlitz River.

You mentioned that the area was probably within the historical range of the Columbia Whitetail Deer according to L. M. Cowan, 1936, "Distribution and Variation in Deer (Genus *Odocoileus*) of the Pacific Coastal Region of North America," California Fish and Game 22(3): 155-246. This reference indicated the range was from the south end of Puget Sound to the Umpqua River and from the coast (Astoria) to the Dalles. Due to habitat destruction and pressure from people, the species is now only found in remnant populations along the lower Columbia River near Cathlamet and Skamokawa and near Roseburg, Oregon. You mentioned a recent study of the species for which a report has not been released. If this report becomes available, I would be interested in receiving a copy for my own professional curiosity.

Concerning the Brown Pelican, you said that it is a strictly coastal species for which you know of no records as far inland in Washington as the location in question.

If you agree that this letter accurately reflects our discussion, please sign and date the attached copy and return it to me in the enclosed envelope. Please correct any inaccuracies in the letter and sign it with those stipulations. Thank you for your help.

Sincerely,

A. David Every

A. David Every, PhD
Staff Ecologist
Northwest Environmental Center

ADE:eh

Rocky D. Spencer
Rocky Spencer

Wildlife Biologist
Title

5-19-82
Date

OWENS, WEAVER, DAVIES & DOMINICK

A PROFESSIONAL SERVICES CORPORATION

ATTORNEYS AT LAW

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ALEXANDER W. MACRIE
HENRY S. MCCLEARY JR.

June 3, 1982

Mr. Nicholas D. Lewis, Chairman
Washington Energy Facility Site
Evaluation Council
Mail Stop PY-11
Olympia, WA 98504

Re: In the Matter of Puget Sound Power & Light Company,
et al, (Skagit/hanford Nuclear Project, Units 1 & 2)
Application No. 81-1

Dear Mr. Lewis

As you will recall, at the time of the hearing on the Construction Impact Group's application for intervention, the Council was advised that their consultant's study had been substantially completed. The CIG had planned to make distribution of that report by this time, however the situation now appears to be so fluid in the Tri-Cities area that the report probably would serve little purpose at this time.

While the CIG hopes to have any socioeconomic impacts clearly addressed in the site certification agreement, it is going to take additional work before any meaningful conclusions can be drawn. It is the CIG's feeling that further exploration of the socioeconomic impacts would probably be inappropriate until the impact of current events can be reasonably assessed.

With these thoughts in mind, the CIG wishes to defer for the time being any report to the Council. We trust that this course of action is acceptable to the Council and of course would be more than happy to discuss it further or appear before the Council, if appropriate.

Very truly yours,

OWENS, WEAVER, DAVIES & DOMINICK

Frank J. Owens

FJO/so
cc F. Theodore Thomsen